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Attorney for Reymundo Garcia

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

REYMUNDO GARCIA,

Defendant.

No. **4:20-CR-06002-SAB-5**

DEFENDANT
REYMUNDO GARCIA'S
MOTION FOR EXTENSION
OF TIME TO FILE
OBJECTIONS TO PRE-
SENTENCE INVESTIGATION
REPORT AND
SENTENCING MEMORANDUM

WITHOUT ORAL ARGUMENT
November 15, 2021 @6:30 p.m.
Yakima, WA

PLEASE TAKE NOTICE that, OSCAR BARRERA-GAYTAN, by and through his attorney of record, Ricardo Hernandez, moves this court for an Extension of time to File Objections to Pre-Sentence Investigation Report and Sentencing Memorandum.

DATED this 12th day of November 2021

HERNANDEZ LAW OFFICE, LLC

s/ Ricardo Hernandez
Ricardo Hernandez

JOINDER

Attorney for Defendant

DECLARATION OF COUNSEL

RICARDO HERNANDEZ, being first duly sworn upon oath, deposes and

States as follows:

1. I am the attorney of record for the defendant Reymundo Garcia in the above matter.
2. I am requesting an Extension of time to File Objections to Pre-Sentence Investigation Report and Sentencing Memorandum. I am requesting a one-week extension from Monday November 15, 2021 to Monday November 22, 2021.
3. Defense counsel has had 4 family funerals in the last month.
4. For the reason stated above, defense counsel respectfully requests an Extension of time to File Objections to Pre-Sentence Investigation Report and Sentencing Memorandum.

DATED: November 12, 2021

Respectfully Submitted.

s/ Ricardo Hernandez
Ricardo Hernandez #21463
Attorney for Reymundo Garcia
HERNANDEZ LAW OFFICE, LLC

JOINDER

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2021 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification to the Assistant United States Attorney Stephanie Van Marter.

DATED this 12th day of November 2021.

HERNANDEZ LAW OFFICE, LLC

s/ Ricardo Hernandez
Ricardo Hernandez, 21463
Attorney for Reymundo Garcia